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8 CHEVRON U.S.A. INC.,
a Pennsylvania corporation
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10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION
12

13 MARK SNOOKAL, an individual,
14 Plaintiff,
15 vs.

16 CHEVRON USA, INC., a California
Corporation, and DOES 1 through 10,
17 inclusive,
18 Defendants.
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Case No. 2:23-cv-6302-HDV-AJR

**DEFENDANT CHEVRON U.S.A.
INC.'S WITNESS LIST**

Place: Courtroom 5B – 5th Floor
Judge: Hon. Hernán D. Vera

Action Filed: August 3, 2023
Pre-Trial Conf.: July 29, 2025
Trial Date: August 19, 2025

Witness Name, Title, Affiliation	Summary of Testimony	Direct Exam	Cross Exam	Dates of Testimony
*Dr. Victor Adeyeye, De-Log ¹ Nigeria Limited	Dr. Adeyeye was a cardiologist in Nigeria who provided an opinion on Plaintiff's cardiac condition. Dr. Adeyeye will testify regarding the medical basis and reasons for determining that Plaintiff was not fit for duty for the job in Escravos.	1.0		
*Dr. Ujomoti Akintunde, Chevron Nigeria, Limited	At the relevant time, Dr. Akintunde was a Cardiologist in Nigeria who was consulted regarding Plaintiff's fitness for duty medical suitability for expatriate assignment. Dr. Akintunde will testify regarding the medical basis and reasons for determining that Plaintiff was not fit for duty for the job in Escravos.	1.0		
*Dr. Eshiofe Asekomeh, De-Log Nigeria Limited	Dr. Asekomeh conducted the Medical Suitability for Expatriate Assignment (MSEA) evaluation for Plaintiff. He determined that Plaintiff was not fit for duty. Dr. Asekomeh will testify regarding the medical basis and reasons for determining that Plaintiff was not fit for duty for the job in Escravos.	1.25		
*Dr. Scott Levv.	At the relevant time, Dr. Levv was employed by	1.25		

¹ The * denotes witnesses that may have to testify remotely (in Nigeria or Texas) or via their deposition transcript/video.

Witness Name, Title, Affiliation	Summary of Testimony	Direct Exam	Cross Exam	Dates of Testimony
Chevron U.S.A. Inc., Regional Medical Manager	Chevron U.S.A. as a Regional Medical Manager for the Europe, Eurasia, Middle East and Africa Region. He will testify regarding the fitness-for-duty medical evaluations for expatriate assignments. After Plaintiff complained about discrimination and challenged the decision of the embedded medical team to deem him unfit for duty, Dr. Levy reviewed Plaintiff's case for a second opinion.			
*Cesar Malpica	Mr. Malpica assumed the expatriate assignment in Escravos, Nigeria after Mr. Zaheer.	.75		
Andrew Powers, Human Resources, Chevron U.S.A. Inc.	At the relevant time, Mr. Powers was a Senior Human Resources Manager at Chevron's El Segundo refinery. Plaintiff sent an email to Mr. Powers complaining of alleged disability discrimination. Mr. Powers is also familiar with Chevron U.S.A.'s Human Resources policies and policies regarding expatriate assignments.	.75		
Dr. Irving Sobel, internal medicine doctor with Cedars Sinai.	Dr. Sobel conducted a fitness for duty examination of Plaintiff for the expatriate assignment in Nigeria.	.75		
Dr. Chen Song, Expert	Economic damages, rebuttal to Plaintiff's expert economist	1.0		

Witness Name, Title, Affiliation	Summary of Testimony	Direct Exam	Cross Exam	Dates of Testimony
Economist, Defendant				
Mark Snookal, Plaintiff	Plaintiff Mark Snookal will testify regarding his employment at Chevron USA; his application to be a Reliability Engineering Manager, an Expatriate assignment in Escravos, Nigeria; the application process; the two doctors (Dr. Khan and Dr. Sobel) who examined him who concurred that he was fit for duty; the offer of employment; Chevron's rescission of the expatriate assignment; Mr. Snookal's request for a second opinion of the rescission decision to Human Resources and Dr. Levy; and alleged economic, emotional/psychological damages suffered by him.		2.5	
Thalia Tse, Human Resources Business Partner, Chevron U.S.A. Inc.	At the relevant time, Ms. Tse was Chevron's Human Resources Business Partner at the El Segundo refinery. She reported to Andrew Powers. Ms. Tse assisted with finding Plaintiff an alternative job position after the REM job offer was rescinded. Ms. Tse is familiar with Chevron U.S.A.'s practices regarding employee pay salary grades.	.50		
*Amir Zaheer	Mr. Zaheer assumed the expatriate assignment in Escravos, Nigeria after Plaintiff's job offer was rescinded.	.75		

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2 Dated: July 1, 2025

3 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

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5 By /s/ Tracey A. Kennedy
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9 Attorneys for Defendant
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11 a Pennsylvania Corporation
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